

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**PAULA DEMCHAK**, individually  
and on behalf of all others similarly  
situated,

*Plaintiff,*

v.

**PROMARK RESEARCH  
CORPORATION**, a Texas  
corporation,

*Defendant.*

Case No. 4:16-cv-14403

Honorable Linda V. Parker

Magistrate Judge David R. Grant

**PLAINTIFF'S MOTION TO CONTINUE  
CASE MANAGEMENT AND SCHEDULING CONFERENCE**

Plaintiff Paula Demchak, by and through her undersigned counsel, hereby respectfully moves the Court to enter an Order rescheduling the Case Management and Scheduling Conference currently set for April 13, 2017, and all associated deadlines. In support of the instant motion, Plaintiff states as follows:

1. On December 19, 2016, Plaintiff filed her Class Action Complaint. (Dkt. 1.)
2. On March 31, 2017, Defendant Promark filed its Answer and affirmative defenses to Plaintiff's Class Action Complaint. (Dkt. 10.)
3. Immediately following the filing of Promark's Answer, the Court entered an Order scheduling a conference for April 13, 2017, and requiring the

Parties' filing of a joint discovery plan no later than three days prior to the conference. (Dkt. 11.)

4. Since service of Plaintiff's complaint, the Parties have engaged in several discussions regarding the underlying facts of Plaintiff's claims, Defendant's involvement in the alleged conduct at issue, and its financial condition. In particular, the Parties have discussed Defendant's informal production of certain information related to these topics.

5. At this point, Plaintiff has yet to receive Defendant's promised and anticipated document production, and is otherwise awaiting a response from Defendant in that regard. Plaintiff reasonably anticipates receiving that information within the next two weeks.

6. Given the Parties informal discussions and Defendant's anticipated production, Plaintiff believes it would be in the Parties' and the Court's interest to conserve their resources, and for the Parties to continue their informal discussions. As such, Plaintiff respectfully proposes a brief, two-week continuance of the current case management deadlines.

7. Plaintiff seeks the instant continuance in good faith and not for any improper purpose, such as delay.

8. Prior to filing the instant motion, Plaintiff attempted to confer with Defendant but did not receive a response—perhaps because of the interceding

holiday.

WHEREFORE, for the foregoing reasons, Plaintiff Demchak respectfully requests that the Court enter the proposed Order, attached as Exhibit A, rescheduling the Case Management Conference currently set for April 13, 2017 at 11:00 AM, to 27, 2017 at 11:00 AM, or such other date and time as is convenient for the Court.

Respectfully Submitted,

**PAULA DEMCHAK**, individually and on behalf of all others similarly situated,

Dated: April 10, 2017

By: /s/ Ari J. Scharg  
One of Plaintiff's Attorneys

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**CERTIFICATE OF SERVICE**

I, Ari J. Scharg, an attorney, certify that on April 10, 2017, I served the above and foregoing ***Plaintiff's Unopposed Motion to Continue Case Management and Scheduling Conference***, by causing true and accurate copies of such paper to be filed with the Court and transmitted to all counsel of record via the Court's CM/ECF electronic filing system.

/s/ Ari J. Scharg